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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

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 BOBBIE JOE HULING, CYNTHIA
 WHETSELL, MARTHA MERLE, ELAINA
 HUFNAGEL, TERESA GATTUSO, ELISSA
 WAGNER, AND DIXIE WILLIAMS,
 INDIVIDUALLY AND ON BEHALF OF ALL
 OTHERS SIMILARLY SITUATED,

Plaintiffs,

v.

RODAN + FIELDS, LLC, A CALIFORNIA
 LIMITED LIABILITY COMPANY,

Defendant.

No. 4:18-cv-02248-PJH

STIPULATED MOTION AND
~~[PROPOSED]~~ ORDER FOR
ADMINISTRATIVE RELIEF

Judge: Phyllis J. Hamilton

STIPULATED MOTION AND ~~[PROPOSED]~~ ORDER FOR ADMINISTRATIVE RELIEF

The parties filed a Stipulation Governing the Discovery and Production of Electronically Stored Information and Documents, April 29, 2019, ECF No. 70 (“ESI Stipulation”), which the Court then approved in an Order, May 1, 2019, ECF No. 72. The ESI Stipulation refers to an Appendix A setting forth technical specifications for production format. *See* ESI Stipulation at 5, 6. That Appendix, however, was inadvertently omitted from the ESI Stipulation. The parties now stipulate to, and respectfully move the Court for an order, approving Appendix A to the ESI Stipulation. Appendix A is attached to this Stipulated Motion.

Dated: May 1, 2019

/s/ Michael D. Woerner

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Dated: May 1, 2019

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Attorneys for Defendants

ATTESTATION OF FILER

I, Michael D. Woerner, am the ECF user whose identification and password are being used to file this STIPULATED MOTION. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all other signatories to this document concurred in its filing.

By: /s/ Michael D. Woerner
Michael D. Woerner

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2019, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to parties and attorneys who are filing users.

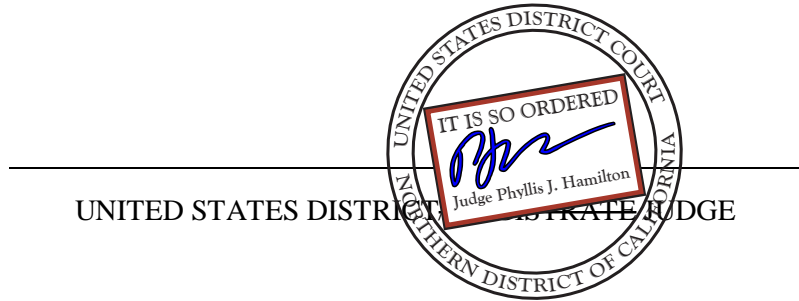
I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 1, 2019

/s/ Michael D. Woerner
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Pursuant to Stipulation, **IT IS ORDERED** that the attached Appendix A to the parties' ESI Stipulation is approved.

Dated: May 2, 2019



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
CLERK OF COURT

APPENDIX A

1. Electronically Stored Information Production Format

All ESI is to be produced in an “imaged” file with the corresponding “image load/unitization files,” “OCR or Extracted text files,” and the “associated delimited metadata database.” Additionally, the requesting party specifies that select files should be produced in their native file format where an image file does not adequately represent the files as maintained in the ordinary course (often this relates to databases, spreadsheets, media, and presentations). Where ESI exists as structured data, production in an alternative format is preferred and the parties shall meet and confer to finalize an appropriate alternative format. The key concepts are explained below.

Native: Microsoft Access files, Excel files, .CSV files, other similar databases and spreadsheet files, and media files shall be produced in the format which the electronically stored information was originally created. If media files are maintained in a non-standard format, they shall be produced as MP3 files for audio or AVI files for video. If a spreadsheet requires redactions across entire rows or columns the parties shall meet and confer to agree on a native file redaction format to avoid imaging spreadsheets for the purpose of full column or row redactions. Native Files will be produced together with a placeholder TIFF image. Each TIFF placeholder will contain language indicating that the document is being produced in native format. A relative file path to the native file shall be provided in the metadata database as described in item 5. To the extent the requesting party obtains through discovery a file or document that it believes is not adequately represented in an image file format, it may request that file or document be produced in native format, the production of which may not unreasonably be withheld.

Imaged File: a TIFF image converted from the native file as it was originally created;

All images shall be 1 Bit group4 black and white TIFF files (except when color images are required to read or understand the file/document's content; all color images shall be produced as a JPEG file);

Hidden content, tracked changes or edits, comments, notes, and other similar information viewable within the native file shall also be imaged so that such content is viewable on the image;

Bates numbers shall be branded to the images so that the numbers print;

Images shall be single page image files (one file for each page of a document).

Image Load/Unitization Files: An image load/unitization file in a standard .opt or .log litigation support image load format shall be included which provides:

the document number for each image;

the full path name(s) of each image file;

the document boundaries for each document;

the load file shall be in the order that appropriately corresponds with each image file;

the following represents the format of a standard .opt or .log image load/unitization file:

Bates,Volume,PATH_to_image,Document Break,Folder Break,Box Break,Total_Pages.

M_0100000,06150101,\06150101\0000\0001.TIF,Y,,,1
M_0100001,06150101,\06150101\0000\0002.TIF,Y,,,1
M_0100002,06150101,\06150101\0000\0003.TIF,Y,,,1
M_0100003,06150101,\06150101\0000\0004.TIF,Y,,,2
M_0100004,06150101,\06150101\0000\0005.TIF,,,,,
M_0100005,06150101,\06150101\0000\0006.TIF,Y,,,1
M_0100006,06150101,\06150101\0000\0007.TIF,Y,,,4
M_0100007,06150101,\06150101\0000\0008.TIF,,,,,

M_0100008,06150101,\06150101\0000\0009.TIF,,,,,
M_0100009,06150101,\06150101\0000\0010.TIF,,,,,

OCR or Extracted Text File: An OCR or Extracted text file which corresponds to each produced document shall be provided as follows:

Document level OCR text for redacted documents or Extracted text for ESI not containing redaction are to be located in the same directory as its image file;

The text file name shall be the same name of the first image page for the document set, followed by .txt.

An OCR or Extracted text file containing the produced document's content will be provided for all documents whether it is produced as an image file or natively.

An OCR file should only be provided for ESI when privilege redactions are required.

Associated delimited metadata database: A database load file shall be provided in a ".dat" file format that extracts metadata into fields in a delimited text load file. For the .dat file the parties should use delimiters (ASCII 020 corresponding to a comma, ASCII 254 corresponding to a double quote, ASCII 174 corresponding to a new line, and a semicolon used to separate values). The fielded data should include all the below metadata fields for a file/document in addition to the unitization (including the production number of the first and last page of each document) and attachments (including information sufficient to identify the parent and child relationships of all documents that are or have attachments). The first line of the data load file should contain the field headers indicating the contents of each field, and each subsequent line should contain the fielded data for each document.

FIELD NAME	FIELD DESCRIPTION	APPLICABLE FILE TYPE(S)
BEGBATES	Beginning production number for a given file/document	Email, E-Doc and Other ¹
ENDBATES	Ending production number for a given file/document	Email, E-Doc and Other
BEGATTACH	Production number of first page of parent	Email, E-Doc and Other
ENDATTACH	Production number of last page of last attachment	Email, E-Doc and Other
CUSTODIAN	Person, shared file or other source from whom files were collected	Email, E-Doc and Other
DUPLICATE CUSTODIAN	To identify other custodians whose files contained a particular document that was eliminated through exact match HASH value de-duplication	Email, E-Doc and Other
DUPLICATE FILEPATH	Folder locations of documents held by other custodians whose copy of the document was not produced based on exact match HASH value de-duplication. Folder names shall be delimited by semicolons.	Email, E-Doc and Other
FILEEXT	File extension	Email and E-Doc
HASH	MD5 Hash Value	E-mail and E-Doc
ATTACHNAME	The file name(s) of attachments to a parent documents (separated by a semicolon)	Email and E-Doc
EMAILSUBJECT	Email Subject line	E-mail
FROM	Email Sender	E-mail
TO	Email Recipient	E-mail

¹ Other is defined as documents for which internal metadata is not exchanged, including but not limited to, scanned documents and documents obtained from the internet.

FIELD NAME	FIELD DESCRIPTION	APPLICABLE FILE TYPE(S)
CC	Email Copyee	E-mail
BCC	Email Blind Copyee	E-mail
DATESENT	Date Sent & Time (MM/DD/YYYY HH:MM)	E-mail
DATERECEIVED	Date Received & Time (MM/DD/YYYY HH:MM)	E-mail
DATELASTMOD	Date modified & Time (MM/DD/YYYY HH:MM)	E-Doc
DATECREATED	Date created & Time (MM/DD/YYYY HH:MM)	E-Doc
TITLE	Any value populated in the Title field of the document properties	E-Doc
SUBJECT	Any value populated in the Subject field of the document properties	E-Doc
AUTHOR	Any value populated in the Author field of the document properties	E-Doc
LASTMODIFIEDBY	Any value populated in the last modified by field of the document properties	E-Doc
ITEMTYPE	Identifies whether the file is an email, attachment to email, or loose edoc	E-mail and E-Doc
REDACTION	Identifies whether the file was redacted and the redaction type	E-mail and E-Doc
CONFIDENTIAL	Identifies whether the file is designated confidential and designation type	E-mail and E-Doc
FILENAME	Original file name	E-Doc

FIELD NAME	FIELD DESCRIPTION	APPLICABLE FILE TYPE(S)
FILEPATH	Original file path to the file or e-mailbox folder structure	E-mail and E-Doc
NATIVEFILE	Path to native file as produced	Native
TEXTPATH	Path to OCR or extracted text file	E-mail, E-Doc and Other

Structured ESI: Structured data tends to be data in or exported from a database and has the following characteristics:

- Logical entities decomposed into data elements (known as fields or records) at a highly granular level;
- Individual data elements are stored in specific assigned logical and physical areas within a series of files (or a single fielded table or a text delimited file);
- These data elements are linked to each other by internal mechanisms, interpretable by the database software;
- These links or relationships may involve metadata elements stored within the database, in addition to the data elements of the logical entity; and
- Once properly assembled and formatted (e.g., in the form of a report), structured data is often readily understandable.

Responsive ESI existing in a structured format shall be produced in an alternative format agreed to by the parties. Common structured ESI production formats include CSV or TAB delimited text file, and Microsoft Access database files.

Embedded Objects: The parties shall meet and confer over the inclusion or exclusion of embedded files from the production.

2. Hard-Copy (i.e., non-ESI) Production Format

The following applies to documents that exist only in hard-copy format and are therefore unavailable in native electronically stored information (“ESI”) format. All such documents that are amenable to being imaged should be produced in an “imaged” file with the corresponding “image load/unitization files,” “OCR text files,” and the “associated delimited database,” as defined below. Documents that exist only in hard copy should not be produced in hard copy format.

1. **1. Imaged File:** a TIFF image scanned from the hard copy document;

All images shall be 1 bit group4 black and white TIFF files (except when color images are required to read or understand the file/document’s content; all color images shall be produced as a JPEG file);

Bates numbers shall be branded to the images so that the numbers print;

Images shall be single page image files (one image file for each document’s page).

Image Load/Unitization Files: An image load/unitization file in a standard .opt or .log litigation support image load format shall be included which provides:

the document number for each image;

the full path name(s) of each image file that represents a document page;

the document boundaries for each document;

the load file shall be in the order that appropriately corresponds with each image file;

the following represents the format of a standard .opt or .log image load/unitization file:

Bates,Volume,PATH_to_image,Document Break,Folder Break,Box Break,Total_Pages.

M_0100000,06150101,\06150101\0000\0001.TIF,Y,,,1
 M_0100001,06150101,\06150101\0000\0002.TIF,Y,,,1
 M_0100002,06150101,\06150101\0000\0003.TIF,Y,,,1
 M_0100003,06150101,\06150101\0000\0004.TIF,Y,,,2
 M_0100004,06150101,\06150101\0000\0005.TIF,,,,
 M_0100005,06150101,\06150101\0000\0006.TIF,Y,,,1
 M_0100006,06150101,\06150101\0000\0007.TTF,Y,,,4
 M_0100007,06150101,\06150101\0000\0008.TIF,,,,,
 M_0100008,06150101,\06150101\0000\0009.TIF,,,,,
 M_0100009,06150101,\06150101\0000\0010.TIF,,,,,

OCR/Extracted Text File: An OCR text file which corresponds to each imaged document shall be provided as follows:

Document level OCR text file for each imaged document located in the same directory as the image file;

The OCR file name shall be the same name of the first image page for the document set, followed by .txt.

Associated delimited database: A database shall be provided in a “.dat” file format that extracts metadata into fields in a delimited text load file. The .dat file should use delimiters (ASCII 020 corresponding to a comma, ASCII 254 corresponding to a double quote, ASCII 174 corresponding to a new line, and a semicolon used to separate values). The fielded data should include all the below metadata fields for a file/document in addition to the unitization (including the production number of the first and last page of each document) and attachments (including information sufficient to identify the parent and child relationships of all documents that are or have attachments as captured by any hard copy binding). The first line of the data load file should contain the field headers indicating the contents of each field, and each subsequent line should contain the fielded data for each document. Load files shall include the below metadata fields, or substantially identical metadata fields, to the extent already in existence and reasonably

accessible.

FIELD NAME	FIELD DESCRIPTION
BEGBATES	Beginning production number for a given document
ENDBATES	Ending production number for a given document
CUSTODIAN	Person, shared file or other source from whom files were collected
REDACTION	Identifies whether the file was redacted
CONFIDENTIAL	Identifies whether the file is designated confidential
TEXTPATH	Path to OCR text file

Production Media

1. All productions must be produced on CD-ROM, DVD, external hard drive (with standard PC-compatible interface), or such other readily accessible computer or electronic media or via FTP as the Parties may hereafter agree upon (the “Production Media”). The Parties must accompany all document productions with a letter identifying the production date and the Bates number range of the materials contained on such Production Media item.

Each media volume must have its own unique name and a consistent naming convention (for example ZZZ001 or SMITH001).

The producing party shall encrypt the production data using WinRAR or 7-Zip encryption, and the producing party shall forward the password to decrypt the production data separately from the CD, DVD, external drive or FTP to which the production data is saved.